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Attorneys for Defendants  
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

PEYMAN PAKDEL and SIMA CHEGINI,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN FRANCISCO  
a Chartered California City and County; SAN  
FRANCISCO BOARD OF SUPERVISORS,  
an elected body of the City and County of San  
Francisco; SAN FRANCISCO  
DEPARTMENT OF PUBLIC WORKS, a  
department of the City and County of San  
Francisco; and DOES 1-25 inclusive,

Defendants.

Case No. 3:17-cv-03638-RS

**STIPULATION AND ORDER EXTENDING  
TIME TO FILE MOTION TO DISMISS,  
OPPOSITION TO MOTION TO DISMISS,  
AND REPLY TO OPPOSITION**

Trial Date: N/A

Judge: Richard Seeborg

Pursuant to Local Rule 6-2, PEYMAN PAKDEL and SIMA CHEGINI (“Plaintiffs”) and City and County of San Francisco, a Chartered California City and County; San Francisco Board of Supervisors, an elected body of the City and County of San Francisco; and San Francisco Department of Public Works, a department of the City and County of San Francisco (collectively herein “San Francisco”) by and through their attorneys of record hereby stipulate and agree:

1           1.       On November 29, 2021, the Court issued a Case Management Order establishing the  
2 following briefing schedule for this matter:

- 3           •       “Plaintiffs will file their First Amended Complaint on or before January 5, 2022[.]”  
4           •       “Defendant will file its motion to dismiss the First Amended Complaint on or before  
5 March 2, 2022.”  
6           •       “Plaintiffs will file their response to the motion to dismiss on or before April 13, 2022.”  
7           •       “Defendant will file its reply on or before June 1, 2022.”

8           2.       Plaintiffs filed their First Amended Complaint on January 5, 2022.

9           3.       Due to unanticipated medical and health issues that caused San Francisco’s lead  
10 counsel Kristen Jensen to take sick leave as a result of contracting SARS-CoV-2, the parties agree that  
11 San Francisco may have an extension of time to file its motion to dismiss the First Amended  
12 Complaint from March 2, 2022 to April 1, 2022, or to other such date as is acceptable to the Court.

13           4.       Plaintiffs may have an extension of time to file their opposition and response to the  
14 motion to dismiss from April 13, 2022 to May 13, 2022, or to other such date as is acceptable to the  
15 Court.

16           5.       San Francisco may have an extension of time to file its reply to Plaintiffs’ opposition  
17 and response from June 1, 2022 to July 1, 2022, or to other such date as is acceptable to the Court.

18           6.       The 30-day extensions agreed upon herein may extend the scheduling of other Court  
19 dates and deadlines and that no party is prejudiced by these extensions.

20           IT IS SO STIPULATED.

21  
22 Dated: February 17, 2022

DAVID CHIU  
City Attorney  
KRISTEN A. JENSEN  
CHRISTOPHER T. TOM  
Deputy City Attorneys

25 By: /s/ CHRISTOPHER T. TOM  
26 CHRISTOPHER T. TOM

27 Attorneys for Defendants  
28 City and County of San Francisco, et al.

1 Dated: February 17, 2022

2  
3 JEFFREY W. McCOY  
4 ROBERT H. THOMAS  
5 JAMES S. BURLING  
6 ERIN E. WILCOX  
7 PAUL F. UTRECHT  
8 THOMAS W. CONNORS

9 By: /s/ JEFFREY W. McCOY (with consent)  
10 JEFFREY W. McCOY

11 Attorneys for Plaintiffs  
12 Peyman Pakdel and Sima Chegini  
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**[PROPOSED] ORDER**

Pursuant to the foregoing stipulation of the parties, and good cause appearing therefore, IT IS  
HEREBY ORDERED that:

1. San Francisco may have an extension of time to file its motion to dismiss the First  
Amended Complaint to April 1, 2022.

2. Plaintiffs may have an extension of time to file their opposition and response to the  
motion to dismiss to May 13, 2022.

3. San Francisco may have an extension of time to file its reply to Plaintiffs' opposition  
and response to July 1, 2022.

IT IS SO ORDERED.

Dated: February 22, 2022



Hon. Richard Seeborg  
United States District Judge